



FISHER | TAUBENFELD LLP

225 Broadway, Suite 1700  
New York, New York 10007  
**Main** 212.571.0700  
**Fax** 212.505.2001  
www.fishertaubenfeld.com

Writer's direct dial: (212) 384-0258  
Writer's email: michael@fishertaubenfeld.com

September 1, 2021

**VIA ECF**

Hon. Alison J. Nathan  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Manjarrez v. Bayard's Ale House LLC et al.  
Case No.: 21-cv-1968 (AJN)

Dear Judge Nathan:

We represent Plaintiff in this matter. We respectfully request that the Court adjourn for two weeks the deadline for Plaintiff to file a motion for conditional certification of a collective action. Defendants consent to this request. The current deadlines are as follows:

1. Opening motion due on 9/1/2021;
2. Opposition due on 9/29/2021; and
3. Reply due on 10/6/2021.

The new deadlines would be:

**SO ORDERED.**

1. Opening motion due on 9/15/2021;
2. Opposition due on 10/13/2021; and
3. Reply due on 10/20/2021.

  
9/2/2021

The reason for the request is that the parties continue to engage in settlement discussions to resolve this matter, which were more delayed by my vacation than expected. We therefore request the extension, which is also necessitated by the Jewish holiday next week, which I observe. We therefore respectfully request that the Court adjourn the deadlines as requested above.

Thank you for your attention to the above.

Respectfully Submitted,

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Michael Taubenfeld